UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

STARK & STARK, P.C.

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In Re:

Case No. 23-18993 (MBK)

Rite Aid Corporation, et al.,

Chapter 11

Debtors.

## VERIFIED STATEMENT OF STARK & STARK, P.C. PURSUANT TO RULE 2019 OF FEDERAL RULES OF BANKRUPTCY PROCEDURE

Stark & Stark, P.C. ("Stark & Stark") submit this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, and respectfully state as follows:

- 1. For purposes of this Statement, the address of Stark & Stark is 100 American Metro Blvd., Hamilton, NJ 08619. Subject to continued investigation, and reserving all rights, Stark & Stark believes that it does not hold prepetition unsecured claims against the Debtors.
- 2. Stark & Stark each currently represents the following entities (the "Clients") as creditors and/or parties-in-interest with respect to the above-captioned bankruptcy case (the "Case"):

Levin Management Corporation 975 US-22 Plainfield, NJ 07060

800 Sylvan Avenue Englewood Cliffs, NJ 007632

Conopco, Inc. d/b/a Unilever

Somerset County Shopping Center c/o Levin Management Corporation 975 US-22 Plainfield, NJ 07060 Arlona Limited Partnership c/o Levin Management Corporation 975 US-22 Plainfield, NJ 07060 MAG II Morrell Plaza, LP. c/o Levin Management Corporation 975 US-22 Plainfield, NJ 07060 Trust for the Benefit of Catherine M. Levin, et als. c/o Levin Management Corporation 975 US-22 Plainfield, NJ 07060

Robert Marin and Celeste de Schulthess Marin Family Trust 12728 Parkyns Street Los Angeles, CA 90049 Felos Associates, LLC 7928 East Dr., Apt. 1008 North Bay Village, FL 33141

Santiago Holdings II, LLC 9454 Whilshire Blvd. Beverly Hills, CA 90212 Sunrest Properties, LLC c/o Dougherty and Connell 450 Wireless Blvd. Hauppauge, NY 11788

Garfield Building, LLC c/o Jonna Realty Ventures 39533 Woodward Ave., Suite 310 Bloomfield Hills, MI 48304 Yoko C. Gates Trust 441 Nevada Ave. San Mateo, CA 94402

Alp and Alex Aslan 1356 Stradella Rd. Los Angeles, CA 90077

- 3. Stark & Stark has represented Levin Management Corporation, Arlona Limited Partnership, the Trust for the Benefit of Catherine M. Levin, et als., Somerset County Shopping Center and Conopco, Inc. d/b/a Unilever prior to the date of commencement of the Case (the "Petition Date")
- 4. Stark & Stark has not represented Robert Marin and Celeset de Schulthess Marin Family Trust, Felos Associates, LLC, MAG II Morrell Plaza, LP., Sunrest Properties, LLC, Garfield Building, LLC, Santiago Holdings II, LLC, Garfield Building, LLC, Alp and Alex Aslan and/or the Yoko C. Gates Trust prior to the Petition Date.
- 5. The Clients currently hold claims, including unsecured pre-petition claims, Section 503(b)(9) priority claims, post-petition administrative claims and potentially other claims, including service claims, rejection claims for unpaid rent and other charges. The full amount of each of the Client's claims is undetermined at this time.

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- 6. The Clients have all retained Stark & Stark as counsel, to represent them with respect to their interests in connection with the above captioned case. All parties are being billed on a monthly basis. All parties are aware of Stark & Stark represents other clients in this case.
- 7. Upon information and belief formed after due inquiry, Stark & Stark does not owns any equity interests in the Debtor.
- 8. Stark & Stark does not have written contracts of representation with the Clients other than ordinary and usual engagement letters.
- 9. Stark & Stark represents each of the Clients individually and the Clients do not constitute a committee. If Stark & Stark undertakes an additional representation of other clients in this Chapter 11 Case, this statement will be supplemented in accordance with Bankruptcy Rule 2019.
- 10. Neither this Statement, nor any previous or subsequent appearance, pleading, claim or suit, is intended to waive: (a) any Client's right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) any Client's right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) any Client's right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretional withdrawal; (d) any Client's right to object to the subject-matter jurisdiction of the Court and shall not be deemed or construed as a submission of any Client to the jurisdiction of the Court; and (e) any other rights, claims, actions, defenses, setoffs, or recoupments to which any Client is or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved by each Client.

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## **VERIFICATION**

I hereby certify that, based on inquiry, the foregoing facts and statements are true and correct, to the best of my knowledge, information, and belief. Stark & Stark reserves the right to revise and supplement this statement.

**STARK & STARK** 

A Professional Corporation

By: <u>/s/ Thomas S. Onder</u> Thomas S. Onder, Esq.

And

By: /s/ Joseph H. Lemkin
Joseph H. Lemkin, Esq.